ORIGINAL

wallmank@wallman.com
555 12th Street NW
Suite 321
Washington, DC 20004

WALLMAN STRATEGIC CONSULTING, LLC

Phone: 202.347.4964
Fax: 202.347.4961

EX PARTE OR LATE FILED

August 12, 1999

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
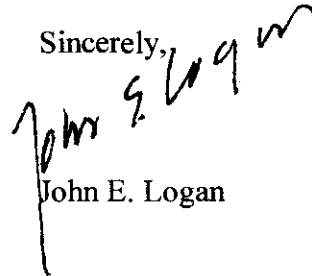445 12th Street, SW
Washington, DC 20554

Ex Parte Filing
CC Docket No. 96-98

Dear Ms. Salas:

On August 11, 1999 John E. Logan and Robert W. Spangler of Wallman Strategic Consulting, LLC and Tina S. Pyle and Richard A. Karre of MediaOne Group met with Sarah Whitesell, Legal Assistant to Commissioner Gloria Tristani, to discuss MediaOne's position in the referenced proceeding. The MediaOne representatives described the company's operations as a facilities-based provider of competitive local exchange service and its need for Unbundled Network Elements (UNEs) to compete effectively.

As described in the enclosure, which was distributed at the meeting, MediaOne advocates that the Commission adopt a minimum set of UNEs that must be unbundled on a nationwide basis. Those UNEs should include Operator Services/Directory Assistance, Operations Support Systems, Signaling Systems and Signal-related Information (such as customer name), and Access to Network Terminating Wire in Multi-dwelling Units.

Sincerely,

John E. Logan

Enclosure

cc: Sarah Whitesell, Esq.

No. of Copies rec'd O+1
List ABCDE

Media**One**®

This is Broadband. This is the way.

Media One Digital Telephone Services

Achieving Seamless Interconnection for Consumers:

The Need for Unbundled Network Elements

August 1999

MediaOne Digital Telephone Services

◆ MediaOne currently offers <u>facilities-based</u> local telephone service to <u>residential consumers</u> in seven markets:

- – Atlanta, Los Angeles, Jacksonville, Pompano, Boston, Richmond, and Detroit.
- – More to come.

◆ As a facilities-based provider, MediaOne operates from a position of <u>relative independence from the ILECs.</u>

◆ However, in addition to interconnecting with the incumbents, <u>MediaOne requires several essential elements</u> from them.

> Even facilities-based providers of telephone service require unbundled network elements to effectively compete in the marketplace.

MediaOne's Recommendations Regarding Unbundled Network Elements

◆ The FCC should identify a <u>minimum set of network elements</u> that must be unbundled on a <u>nationwide</u> basis.

◆ Factors that the FCC should consider:

- Cost differences.
- Equivalent quality.
- Geographic scope.
- Delay in offering service.

◆ Specific elements that should be included on the list:

- Operator Services/Directory Assistance
- Operations Support Systems
- Signaling Systems and Signal-Related Information (e.g., CNAM)
- Unbundled Access to Network Terminating Wire in MDUs

◆ At this time, the FCC should not adopt a mechanism to remove elements from its list.

Other Facilities-Based Providers' Recommendations

♦ Cox:

- Electronic access to Operations Support Systems.
- Operator services.
- Directory assistance.
- Signaling and signaling-related information.

♦ Time Warner:

- Directory assistance.
- Signaling systems.

MediaOne, like other facilities-based providers, requires
a few essential elements from the ILECs.

The Efficient Competitor Argument

◆ The ILECs advocate that the FCC focus on what an "efficient competitor " needs.

   – More specifically, the ILECs argue for no unbundling where there are alternatives available to efficient competitors.

◆ MediaOne asks that the FCC focus on the detriment to competition and the benefits to consumers.

   – MediaOne is an efficient competitor offering lower prices and higher quality.
   – MediaOne requires a few essential elements from the ILECs.

The FCC should determine whether the elements are actually available at the same cost, quality, ubiquity and the same time frame as ILEC elements.

Operator Services and Directory Assistance

◆ While there are alternative providers of these services, MediaOne has not found them to be <u>effective substitutes</u> for the ILECs' services.

◆ MediaOne's concerns with alternative suppliers:
   - Third party directory assistance databases less accurate.
   - Limited local presence (e.g., Hollywood, Westchester, and Fox Hills).
   - Concern regarding the handling of emergency calls.
   - Excessive average speed to answer (18 seconds versus 6 seconds).
   - Higher LIDB costs ($0.10 versus $0.034).
   - Extensive national versus local transport costs (i.e., national suppliers complete calls from their tandems, not within local calling areas).

MediaOne's experience in Los Angeles with a third party provider of operator services/directory assistance was less than satisfactory. The alternate service did not meet customers' expectations. MediaOne has terminated this relationship.

Operations Support Systems (OSS)

◆ For <u>ordering and provisioning</u>, MediaOne needs electronic access:

   – CPNI/CSR (i.e., the customer's service record)
   – LNP provisioning processes
   – Directory listings and directory assistance databases
   – 911/E-911 databases
   – Disconnection and issuance of final bill

◆ MediaOne also requires electronic firm order commitment (FOC) returns.

Electronic ordering and provisioning is a fundamental element to serving customers -- efficiently and accurately. MediaOne should not have to fax requests, cut and paste from database to another, nor handle requests manually via phone calls.

Operations Support Systems (OSS) - Continued

◆ For <u>network administration, maintenance and repair</u> (i.e. to serve customers), MediaOne needs electronic access to:

- Trunk ASRs (i.e., access service requests)
- Repair notification and completions
- Operator services/directory assistance monitoring and administration

◆ GTE and USW mistakenly advocate that the <u>only</u> CLECs that require access to ILEC OSSs are those purchasing ILEC UNEs or those reselling ILEC service.

> Automated electronic processes are critical. They are the only way to provide telephony without dramatic increases in work force. They also eliminate the manual errors that exist in current processes.

Signaling and Signaling-Related Information

◆ Facilities-based CLECs, like MediaOne, rely on ILEC signaling networks and related databases.

    – The services offered by third party vendors are not effective substitutes.

        • MediaOne's experience in Jacksonville and Richmond with a third party provider of signaling services was less than satisfactory.

            ➡ Outages and a lack of responsiveness.

    – Some ILECs argue that new entrants can provide their own signaling systems (i.e., those that deploy their own switches).

        • MediaOne's business case demonstrates that it has not yet reached the scale and scope needed to justify its own signaling network.

            ➡ MediaOne must serve <u>over 1 million lines</u> to reach such a cross over point.

Signaling and Signaling-Related Information - Continued

♦ MediaOne requires access to an ILEC's CNAM data in order to provide a functionally equivalent service.

  - MediaOne needs CNAM access to provide caller ID — customers expect to receive both the calling number <u>and</u> calling name.

♦ Because CNAM is not now treated as an unbundled network element, the ILECs can (and do) charge an exorbitant rate for it.

♦ The ILECs could cease offering CNAM access altogether.

♦ While others can provide *access* to the ILECs' CNAM databases, only the ILECs have a database with their customers' names.

Contrary to ILEC advocacy, CLECs that provide their own switches do need access to ILEC signaling networks and related databases.

Access to Network Terminating Wire in MDUs

◆ This is a significant issue for MediaOne in the BellSouth region.

◆ BellSouth places the demarcation point between its network and the inside wiring at each individual unit in an apartment building.

  – In other words, Bell South claims control of the wiring between the MPOE and the individual units as a part of its network.

◆ MediaOne has no other practicable means of reaching MDU customers.

◆ BellSouth's pricing policies increase MediaOne's acquisition costs <u>over $90 per customer.</u>

All local exchange carriers should have equal access to network terminating wire at the MPOE.

Summary

◆ MediaOne is committed to facilities-based competition to the home.

   – MediaOne has an aggressive upgrade strategy.

   – MediaOne is offering telephony to a diverse base of residential customers, including customers in urban and rural areas, many of which have low income and ethnically diverse populations.

◆ Access to several unbundled network elements is critical to MediaOne's local residential facilities-based telephony offering.

Facilities-based providers of residential telephony, like MediaOne, also require access to incumbent LEC unbundled network elements in order to offer a fully competitive telecommunications service offering.